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VIA ECF

Honorable Robyn F. Tarnofsky, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 703
New York, NY 10007

Re: Angelica Parker v. Scott Bursor et al., Docket No. 1:24-cv-245

Dear Magistrate Judge Tarnofsky:

This firm represents non-party movant Ivan Wilzig in connection with his pending motion to quash the subpoena served upon Mr. Wilzig (the “Wilzig Subpoena”) by defendants Scott Bursor and Bursor & Fisher, P.A. (collectively, “Defendants”) in the above-referenced matter. (ECF Doc. Nos. 96-97). We respectfully submit this letter regarding Defendants’ opposition to Mr. Wilzig’s motion to quash. (ECF Doc. Nos. 110-112).

Defendants filed their opposition to Mr. Wilzig’s motion under seal and Mr. Wilzig and his counsel thus are unable to access or review any such opposition. (ECF Doc. Nos. 110-112). Defendants’ counsel has requested that the Court permit Defendants to share their opposition papers with undersigned counsel and/or that the Court direct the Clerk to grant ECF access to Defendants’ opposition papers to undersigned counsel. (ECF Doc. No. 109). To date, however, we are unable to access or review Defendants’ opposition to the pending motion.

Pursuant to Local Rule 6.1(a), Mr. Wilzig’s reply papers are due today. However, because that we have not been provided a copy of Defendants’ opposition and cannot know what arguments are contained therein, we cannot prepare and submit any reply on Mr. Wilzig’s behalf today. Therefore, we respectfully request that the Court grant Mr. Wilzig any opportunity to submit his reply within two (2) business days following Mr. Wilzig obtaining access to Defendants’ opposition. We further respectfully request that the argument presently scheduled for July 30, 2024 be adjourned until after Mr. Wilzig is permitted an opportunity to review Defendants’ opposition papers and to submit his reply. Thank you.

Respectfully submitted,

/s/ Paul H. Schafhauser

Paul H. Schafhauser

cc: All Counsel of Record (via ECF)